APPENDIX 8.1G

Cumulative Impacts Analysis

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CUMULATIVE IMPACTS ANALYSIS

Potential cumulative air quality impacts that might be expected to occur as a result of the proposed Project and other reasonably foreseeable projects are both regional and localized in nature. These cumulative impacts were evaluated as follows.

Cumulative impacts from the Project could result from emissions of carbon monoxide, oxides of nitrogen, sulfur oxides, and directly emitted PM_{10}. To ensure that other projects that might have significant cumulative impacts in conjunction with the Project were identified, a search area with a radius of 6 miles was used for the cumulative impacts analysis.

Within this search area, three categories of projects with combustion sources were used as criteria for identification:

- Projects that are existing and have been in operation since at least 1999.
- Projects for which air pollution permits to construct have been issued and that began operation after 1999.
- Projects for which air pollution permits to construct have not been issued, but that are reasonably foreseeable.

Projects that are existing and have been in operation since at least 1999 are reflected in the ambient air quality data that have been used to represent background concentrations; consequently, no further analysis of the emissions from this category of facilities was performed. The cumulative impacts analysis added the modeled impacts of selected facilities to the maximum measured background air quality levels, thus ensuring that these existing projects were taken into account.

Projects for which air pollution permits to construct have been issued but that were not operational by 1999 were identified through a request of permit records from the SJVUAPCD. The search was requested at two levels. Projects that had a permit to construct issued after January 1, 1998, were included in the cumulative air quality impacts analysis. The January 1, 1998 date was selected based on the typical length of time a permit to construct is valid and typical project construction times, to ensure that projects that are not reflected in the 1999 ambient air quality data are included in the analysis. Projects for which the emissions change was smaller than 5 tons per year were assumed to be *de minimis*, and were not included in the dispersion modeling analysis. A list of projects within the area for which air pollution permits to construct have not yet been issued, but that are reasonably foreseeable, was also requested from the District staff.